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To: Ann Williamson/R10/USEPA/US@EPA, Judy  
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cc: Judy Smith/R10/USEPA/US@EPA

Subject: Logic for Extending Mine Water Public Cmt. Pd.

Ann,

As you requested last week - the logic behind extending the public comment period for the Bunker Hill Mine Water Proposed Plan from August 13, 2001 - September 17, 2001.

- EPA received two requests (one in person at the July 31 public meeting and one in writing from the SNRC) to extend the 30 day mine water proposed plan public comment period. The requesters noted that additional time was needed for public members to review the RI/FS, coordinate with professionals, and prepare written comments. They also noted that additional time was being requested since public members are conducting these activities after working hours and in their free time, which is limited. EPA supports these efforts.

A 35 day extension was suggested (for a total of 65 days for public review and comment) for the following reasons:

- While other recent proposals in the Basin area (i.e., TMDL, NPDES permits for Hecla and Coeur, draft Basin RI/FS documents) have had longer review periods (up to 120 days), these other initiative's have had broader impact than the mine water proposal. For example, the mine water proposal largely impacts one individual, the owner of the Bunker Hill mine. In addition, EPA has coordinated extensively with the mine owner over the past 2-1/2 years which included his participation in technical meetings and his review and comment on draft documents and cleanup strategies. In addition, these other proposals addressed "new" work to be performed which supports a longer time period for the public to digest this new information. The Bunker Hill central treatment plant has been in operation since 1974. The mine water proposed plan does not generally suggest "new" work, but improvements to ongoing operations.

- There had been no significant or substantive technical comments or issues on the RI/FS or proposed plan offered in the comments received to date or expressed at the public meeting, to suggest that a longer extension was appropriate.

- The mine water RI/FS was available on the EPA website for five weeks prior to the start of the public comment period on the proposed plan (effectively extending the public comment period an additional five weeks). The availability of the RI/FS on the website was announced at a Bunker Hill Task Force meeting on June 7, 2001 (five weeks before the public comment period started).

Finally, I note that the Bunker Hill Task Force, the liaison between the community and the EPA/DEQ, has been involved in the mine water process and provided comments on the draft proposed plan in their role as community representatives. Their concerns were reflected in the Proposed Plan. In addition, a Task Force member met with Mr. Hopper prior to the release of the Proposed Plan to discuss outstanding issues/concerns. I understand that the Task Force will not be issuing any further comments.

Let me know if you desire any further information - Mary Kay

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